

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FACTOR 2 MULTIMEDIA SYSTEMS, LLC,
Plaintiff,
v.
COMERICA BANK
Defendant.

CASE NO. 2:24-cv-0401-JRG
LEAD CASE

**JOINT MOTION FOR EXTENSION OF TIME
TO SERVE PRELIMINARY CONTENTIONS**

Plaintiff Factor2 Multimedia Systems, LLC (“Factor2” or “Plaintiff”), and Defendants Comerica Bank (“Comerica Bank”),¹ Regions Financial Corporation (“Regions”),² Texas Capital Bancshares (“Texas Capital”),³ and Washington Federal Bank (“WaFd”)⁴ (collectively, “Defendants”) file this Joint Motion for Extension of Time to Serve Preliminary Contentions and respectfully show the following:

The Court set the Scheduling Conference in this case for November 7, 2024 by its Order of October 23, 2024 (Dkt. No. 9). Pursuant to this Order, the Court ordered Plaintiff to comply with P.R. 3-1 and 3-2 two weeks before the Scheduling Conference (October 24, 2024) and for Defendants to comply with P.R. 3-3 and 3-4 six weeks after the Scheduling Conference (December 19, 2024). The Parties have met and conferred and respectfully request a four-week extension to these respective deadlines.

¹ Factor 2 Multimedia Systems, LLC V. Comerica Bank, Case No. 2:24-cv-0401 (Lead Case)

² Factor 2 Multimedia Systems, LLC V. Regions Financial Corporation, Case No. 2:24-cv-0398 (Consolidated Case)

³ Factor 2 Multimedia Systems, LLC V. Texas Capital Bancshares, Case No. 2:24-cv-0402 (Consolidated Case)

⁴ Factor 2 Multimedia Systems, LLC V. Washington Federal Bank, Case No. 2:24-cv-0403 (Consolidated Case)

Wherefore, the Parties respectfully request that the Court grant this joint motion and enter an order extending the deadline for Plaintiff to comply with P.R. 3-1 and 3-2 to **November 21, 2024** and for Defendant to comply with P.R. 3-3 and 3-4 to **January 16, 2025**.

Respectfully submitted,

Dated: October 29, 2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system, except for Mr. Barry Bumgardner, counsel for Texas Capital Bancshares, who has been served by email and US Mail at the following address:

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that the Parties met and conferred and that the relief sought herein is joint.

/s/ Benjamin C. Deming

Benjamin C. Deming